

Exhibit B

Exhibit B – Valve’s Proposed Schedule

Fact Discovery

- **Rolling Document Productions Begin:** September 30, 2022
- **Substantial Completion of Transactional Data Production:** March 1, 2023
- **Substantial Completion of Parties’ Document Productions:** May 1, 2023
- **Final Deadline for Service of Third-Party Document Subpoenas:** July 1, 2023
- **Deadline to Amend Complaint(s):** March 1, 2023
- **Close of Fact Discovery:** October 31, 2023

Class Certification

- **Plaintiffs’ Class Cert Expert Report(s):** January 16, 2024
- **Valve’s Class Cert Expert Rebuttal Report(s):** March 1, 2024
- **Deadline to Complete Class Cert Expert Discovery:** April 26, 2024
- **Motion for Class Cert:** May 13, 2024
- **Opposition to Class Cert/Valve *Daubert* Motions on Plaintiffs’ Class Cert Expert(s):** July 15, 2024
- **Class Certification Reply/Plaintiffs’ *Daubert* Oppositions/*Daubert* Motions on Valve’s Class Cert Expert(s):** August 29, 2024
- **Valve’s *Daubert* Replies/Valve’s Opposition to *Daubert* Motions:** September 26, 2024
- **Plaintiffs’ *Daubert* Replies:** October 14, 2024

Summary Judgment & Merits Expert Discovery

- **Opening Merits Expert Report(s) (on issues for which the party bears the burden):** 60 days after any grant of class certification
- **Response Merits Expert Report(s):** 120 days after any grant of class certification
- **Rebuttal Merits Expert Report(s):** 150 days after any grant of class certification
- **Close of Merits Expert Discovery:** 165 days after any grant of class certification
- **Last day to file Motions for Summary Judgment/*Daubert* Motions on Merits Experts:** 180 days after any grant of class certification¹
- **Oppositions to MSJs/*Daubert* Motions:** 240 days after any grant of class certification²
- **Replies to MSJs/*Daubert* Motions:** 270 days after any grant of class certification

¹ By setting a last day to file dispositive motions, the parties do not waive or restrict any rights they otherwise have to seek summary judgment at an earlier stage of the case, including prior to class certification or notice.

² Agreed opposition and reply dates listed here apply to summary judgment motions filed 180 days after any grant of class certification. The parties agree to meet and confer regarding opposition and reply dates for any earlier filed summary judgment motion if either party believes the default opposition and/or reply dates under the Local Rules are inadequate.